

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF VIRGINIA  
Lynchburg (Charlottesville) Division**

In re:

Frank A. Passarelli

Debtor

Case No. 17-61972-RBC  
Chapter 7

FRANK A. PASSARELLI,

Debtor/Movant,

v.

Objection to Proof of Claim No. 13

NANCY L. WHEELER.

Creditor/Respondent.

**MOVANT FRANK A. PASSARELLI'S EXHIBITS & WITNESS LISTS**

**I. Exhibits List**

Debtor/Movant, Frank A. Passarelli, by counsel, hereby submits this list of exhibits that he may introduce as evidence at hearing:

PRESIDING JUDGE Rebecca B. Connelly					MOVANT'S ATTORNEY John P. Goetz, VSB # 78514	RESPONDENT'S ATTORNEY Rebecca C. Hryvniak, VSB # 78946
HEARING DATE (S) June 14, 2018 at 2:00 p.m.					COURTREPORTER	COURTROOMDEPUTY
MOV. NO.	RESP. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS	
1					Property Settlement Agreement, dated February 10, 2015	
2					Promissory Note, dated October 26, 2014	
3					Residential Appraisal Report (First 2 Pages), dated January 1, 2015	

Debtor/Movant reserves the right to use any exhibit designated by the Creditor/Respondent and to supplement his list as reasonably necessary.

## II. Witness List

The Debtor/Respondent, Frank A. Passarelli, may directly examine the following witnesses at hearing:

1. Frank A. Passarelli, Debtor/Movant  
15763 Auburn Road  
Culpeper, VA 22701
2. Nancy L. Wheeler, Creditor/Respondent  
P.O. Box 561  
Keswick, VA 22947

Debtor/Movant reserves the right to call any witnesses designated by the Creditor/

Respondent and to supplement his list as reasonably necessary.

Respectfully submitted,

FRANK A. PASSARELLI  
By Counsel

/s/ John P. Goetz  
John P. Goetz, VSB #78514  
John Goetz Law, PLC  
75 W. Lee St., Suite 104  
Warrenton, VA 20186  
T: (540) 359-6605  
F: (540) 359-6610  
docs@johngoetzlaw.com  
*Counsel for Debtor/Movant*

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of May, 2018, I have provided a copy of the foregoing Movant's Exhibit and Witness Lists via the CM/ECF system and/or by first-class, postage paid mail, to counsel for the Creditor/Respondent:

Rebecca Hryvniak, Esq.  
Scott Kroner PLC  
P.O. Box 2737  
Charlottesville, VA 22902

/s/ John P. Goetz  
John P. Goetz, VSB #78514